

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

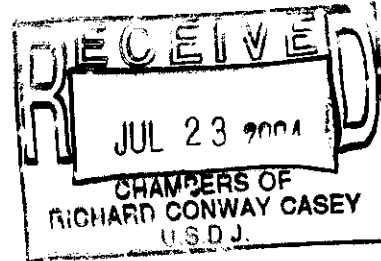
IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
03 MDL 1570 (RCC)

This document relates to:

*Thomas E. Burnett, Sr., et al. vs. Al Baraka  
Investment and Development Corp., et al.*  
03 CV 9849 (RCC)

*Thomas E. Burnett, Sr., et al. vs. Al Baraka  
Investment and Development Corp., et al.*  
03 CV 5738 (RCC)



MOTION FOR ADMISSION PRO HAC VICE

MEMO ENDORSED

PLEASE TAKE NOTICE that, upon the annexed Affidavits, with exhibits, Plaintiffs hereby move this Court for an Order pursuant to Local Civil Rule 1.3(c) admitting Justin B. Kaplan *pro hac vice* to appear as counsel for the Plaintiffs.

Dated: July 21, 2004

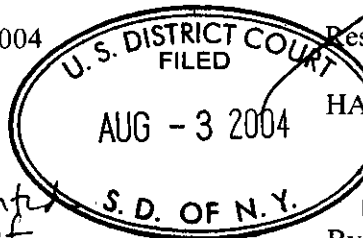
Respectfully submitted,

HANLY CONROY BIERSTEIN  
& SHERIDAN LLP

By:

Paul J. Hanly, Jr. (PH-5486)  
Jayne Conroy (JC-8611)  
Andrea Bierstein (AB-4618)  
415 Madison Avenue  
New York, NY 10017-1111  
Tel: (212) 401-7600

Counsel for Plaintiffs



Application granted  
pending approval of  
attorney admissions office

Richard Conway Casey  
July 28, 2004

MICROFILM  
-9:00 AM  
AUG - 4 2004

UNITED STATES DISTRICT COURT ) **AFFIDAVIT**  
SOUTHERN DISTRICT OF NEW YORK )

**PERSONALLY APPEARED BEFORE ME**, Justin B. Kaplan, who being duly sworn and cautioned states as follows:

1. I am an attorney at Motley Rice LLC, located at 28 Bridgeside Boulevard, P.O. Box 1792, Mount Pleasant, South Carolina 29465.
2. I am a 2002 graduate of the University of Texas at Austin, School of Law, Austin, Texas.
3. I am admitted to practice before all courts in the State of Tennessee, having been admitted to the Tennessee Bar in December of 2003 and having been sworn in by the Supreme Court of the State of Tennessee on April 23, 2004.
4. I am a member in good standing of the Tennessee Bar. I am also a member of the Tennessee Bar Association, the American Bar Association, and the Association of Trial Lawyers of America.
6. I am not currently suspended or disbarred by any jurisdiction in which I have been admitted.
7. I have not been the subject of disciplinary action by the bar of courts of any jurisdiction during the preceding five (5) years, or at any time in my practice.
8. I seek admission to this Court *pro hac vice* for the purpose of assisting in the preparation of trial of the present action. Further, I request to be admitted *pro hac vice* to work with a duly qualified attorney who is licensed to practice in the courts of this state.

**FURTHER, THE AFFIANT SAYETH NOT.**

Sworn to before me this 21<sup>st</sup> day  
of July, 2004.

Deloris Stevenson  
Notary Public for South Carolina  
My Commission Expires: 10-18-2011

ETH NOT.  
*Austin B. Kaplan*  
Justin B. Kaplan, Esq.  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
P.O. Box 1792  
Mt. Pleasant, SC 29465  
(843) 216-9109  
(843) 216-9680 fax

***CLERK OF THE SUPREME COURT***  
***STATE OF TENNESSEE***

*I, Michael W. Catalano, Clerk of the Supreme Court, do hereby certify that JUSTIN BRAUN KAPLAN is a licensed and practicing attorney of the Courts of this State, having taken the oath as prescribed by law, is enrolled as an attorney of this Court, and is in good standing. The Supreme Court is the Court of last resort in Tennessee.*

*Date of Enrollment: April 23, 2004.*

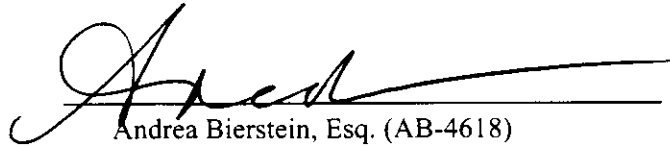
*In testimony whereof, I have set my hand and affixed the seal of the Court on this the 14<sup>th</sup> day of July, 2004.*

*Michael W. Catalano, Clerk*

By *Kimberly A. McCarbs* D.C.

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 22nd day of July 2004, I caused copies of the Motion for Admission Pro Hac Vice and accompanying Exhibits for Justin B. Kaplan to be served on all counsel of record via Email.



Andrea Bierstein, Esq. (AB-4618)